

# EXHIBIT 2

8357 Main Street  
Ellicott City, Maryland 21043  
Telephone: (410) 750.7825  
Facsimile: (443) 583.0430

May 22, 2023

**Via Email**

Katie L. Wall, Esquire  
Jones Day  
2727 North Harwood Street  
Dallas, Texas 75201

Re: In re: LTL Management, LLC; Case No. 23-12825 (MBK)

Dear Ms. Wall:

I have received your letter dated May 22, 2023, regarding the improper discovery requests served upon The Ruckdeschel Law Firm, LLC and The Ruckdeschel Law Firm, LLC's objections and responses to those requests.

Your letter is either hopelessly confused or deliberately misleading. The entire premise of the letter regarding the responses to document requests is a false straw-man claim that The Ruckdeschel Law Firm, LLC's objections and responses assert a claim of privilege. As the word "privilege" does not appear in the objections and responses, your letter is based entirely upon a false premise. Your discussion of D.N.J. LBR 7026-1 is, accordingly, yet another false argument fabricated to distract from the fabricated Debtor's baseless position.

The letter's discussion of Interrogatories 2-12 is similarly false. The letter states:

Ruckdeschel's responses to these interrogatories also includes a statement that it does not have "any non-privileged" information on the various subjects.

5/22/23 Wall letter, at p. 2. Notwithstanding the quotation marks and the specific claim that The Ruckdeschel Law Firm LLC's response "includes a statement ..." no such statement appears in the objections and responses. Rather, that claim is demonstrably false.

In sum, the demand letter is based upon demonstrably false characterizations of the objections and responses filed by The Ruckdeschel Law Firm, LLC. As the premise of the letter is facially untrue, I see no reason for us to "meet and confer." Rather, I request that you go back and re-read the responses filed on behalf of The Ruckdeschel Law Firm, LLC and confirm to me, in writing, (1) that the claims in your letter discussed above are not true, and (2) that your client's complaints about these untrue claims are withdrawn. I believe it is incumbent upon you to unequivocally retract your letter and its demands so that the record is clear.

Katie L. Wall, Esquire  
May 22, 2023  
Page 2

Finally, regarding Interrogatory No. 1, The Ruckdeschel Law Firm, LLC stands on its objections to this Interrogatory as improper and seeking information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Motion to Dismiss. Nevertheless, in the interests of avoiding unnecessary bickering, I advise you that, at present, The Ruckdeschel Law Firm, LLC is unaware of any client who has made a decision to file a lawsuit against the Debtor and has not yet filed a lawsuit against the Debtor.

Very truly yours,

*Jonathan Ruckdeschel*

Jonathan Ruckdeschel

cc: Gregory M. Gordon  
James M. Jones  
David S. Torborg  
Brad B. Erens  
Dan B. Prieto  
Mark W. Rasmussen